

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

CATHOLIC CHARITIES OF
JACKSON, LENAWEE AND
HILLSDALE COUNTIES, ET AL.,

Plaintiffs,

v.

GRETCHEN WHITMER, ET AL.,

Defendants.

Civil No. 1:24-cv-00718-JMB-SJB

**MOTION FOR PRELIMINARY
INJUNCTION**

**ORAL ARGUMENT
REQUESTED**

Plaintiffs respectfully request a preliminary injunction under Federal Rule of Civil Procedure 65(a) and Local Civil Rule 7.2. As explained in the accompanying brief and exhibits, Plaintiffs have demonstrated a likelihood of success on the merits of their claims under the First and Fourteenth Amendments and 42 U.S.C. § 1983. Plaintiffs are suffering irreparable injury that will continue absent an injunction. And the balance of equities and public interest favor injunctive relief. Accordingly, Plaintiffs respectfully request that the Court enter an order enjoining the Defendants from enforcing HB 4616 and HB 4617 against Plaintiffs or otherwise penalizing Plaintiffs for counseling clients on matters of gender identity or sexual orientation.

Pursuant to Local Civil Rule 7.1(d)(i), Defendants' counsel has stated that the named Defendants are unable to concur with this motion. Pursuant to Local Civil Rule 7.2(d), Plaintiffs request oral argument.

Dated: July 19, 2024

Respectfully submitted,

/s/ Luke W. Goodrich

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